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12 *Attorneys for Defendant*  
13 *Woodchase Condominiums Homeowners Association*

14 **UNITED STATES DISTRICT COURT**

15 **DISTRICT OF NEVADA**

16 **BANK OF AMERICA, N.A.,**

17 **CASE NO.: 3:17-cv-00462-MMD-VPC**

18 Plaintiff,

19 **STIPULATION & ORDER TO**  
20 **EXTEND TIME TO FILE RESPONSE**  
21 **TO BANK OF AMERICA,**  
22 **N.A.'S COMPLAINT**

23 vs.

24 **(Fourth Request)**

25 **WOODCHASE CONDOMINIUMS**  
26 **HOMEOWNERS ASSOCIATION; HAMPTON**  
27 **& HAMPTON COLLECTIONS LLC,**

28 Defendants.

29 Plaintiff BANK OF AMERICA, N.A. ("Plaintiff") and Defendant WOODCHASE  
30 CONDOMINIUMS HOMEOWNERS ASSOCIATION ("HOA"), by and through their  
31 respective counsel, hereby agree and stipulate as follows:

32 **IT IS HEREBY AGREED AND STIPULATED**, that the deadline for the HOA to file  
33 a Response to Plaintiff's Complaint [ECF No. 1], which Plaintiff filed on August 2, 2017,  
34 shall be extended an additional thirty (30) days.

35 The parties previously agreed to extend the deadline until February 22, 2018  
36 pursuant to a Stipulation to Extend (Third Request) that was filed on December 21, 2017  
37 [ECF No. 16], which the Court granted on December 27, 2017 [ECF No. 17].

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1           The response is currently due on February 22, 2018 and the new deadline will be  
2 March 26, 2018. This is the Fourth stipulation for extension of time to file a response.

3           Good cause exists for the extension. The parties have reached a settlement and  
4 have signed the settlement agreement and other settlement documents; however, it has  
5 taken the parties longer than anticipated to obtain and exchange the settlement  
6 payments. Thus, the parties need additional time to finalize the settlement and submit a  
7 stipulation and order of dismissal without incurring unnecessary litigation fees and costs.

8           The parties have entered into this agreement in good faith and not for purposes of  
9 delay. This is the parties' way of accommodating one another given the overall increase  
10 in litigation in this area of law.

11          DATED this 22<sup>nd</sup> day of February, 2018.

12          LIPSON NEILSON P.C.

13          */s/ Amber M. Williams*

14  
15          Kaleb D. Anderson, Esq. (Bar No. 7582)  
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18          Las Vegas, Nevada 89144

19  
20          Attorneys for Defendant  
21          Woodchase Condominiums HOA

22          DATED this 22<sup>nd</sup> day of February, 2018.

23          AKERMAN, LLP

24          */s/ Scott R. Lachman*

25          Melanie D. Morgan, Esq. (Bar No. 8215)  
26          Scott R. Lachman, Esq. (Bar No. 12016)  
27          1160 Town Center Drive, Suite 330  
28          Las Vegas, Nevada 89144

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30          Attorneys for Plaintiff  
31          Bank of America, N.A.

32          ORDER

33          IT IS SO ORDERED.

34          DATED: February 26, 2018.



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